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Attorney for Defendant
TMX Finance Corporate Services, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Melvin Nicholas, individually and on behalf of
 all others similarly situated,

Plaintiff,

v.

TMX Finance Corporate Services, Inc. and
 DOES 1 through 10, inclusive,

Defendant.

Case No. 2:23-cv-01749-CDS-NJK

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME TO
RESPOND TO THE COMPLAINT

(FIRST REQUEST)

Plaintiff Melvin Nicholas ("Plaintiff") filed the above-captioned action against Defendant TMX Finance Corporate Services, Inc. ("Defendant") and Does 1-10 in the Eighth Judicial District Court, Clark County, Nevada, Case Number A-23-878564-C, on September 28, 2023 (the "Complaint") and served the Complaint on Defendant on October 9, 2023. Defendant filed a timely Notice of Removal with this Court on October 27, 2023. Pursuant to Fed. R. Civ. P. 81(c)(2)(C), the deadline for Defendant to respond to the Complaint is currently November 3, 2023. However, Defendant filed a motion to transfer this case to the Southern District of Georgia on October 30, 2023. The parties agree it makes sense for the motion to transfer to be decided before a response to the complaint is due. Plaintiff and Defendant accordingly stipulate that Defendant's response to Plaintiff's Complaint shall be due 30 days from the date an order issues on Defendant's pending

1 motion to transfer.

2 Dated: October 31, 2023

3 **KIND LAW**

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Attorney for Defendant

13 **IT IS SO ORDERED.**

14
15 
16 United States Magistrate Judge

17 DATED: November 1, 2023